

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
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    )         CRIMINAL NO. 04-10307-WGY  
    )  
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    )  
v.    )  
    )  
    )  
    )  
STEPHEN DAROSA,                            )  
    )  
Defendant.                                    )

**GOVERNMENT'S SUMMARY OF EXPERT TESTIMONY**

Pursuant to the Fed. R. Crim. P. 16(a)(1)(E), the government hereby discloses a written summary of the testimony and qualifications of Angelo A. Thurman ("Tony" Thurman), a firearms and ammunition expert who will testify at trial regarding the interstate nexus element relating to the firearm and the ammunition in this matter and who may, in addition, testify regarding the nature of the object the government believes to be a firearm as well as the ammunition.

With respect to the substance of Mr. Thurman's testimony, he will testify regarding the interstate nexus element of the offense and the particular firearm and ammunition involved in this matter (and whether they have traveled in interstate commerce). The basis for Mr. Thurman's opinion is his familiarity with firearms of many types, including shotguns, and through his years of experience with firearms which have traveled in interstate commerce.

With regard to Mr. Thurman's qualifications, he is a recognized expert in firearms and ammunition and in determining whether those item(s) have traveled in interstate commerce and has testified in multiple trials. He has served as an ATF Agent for approximately thirteen years. Special Agent Thurman also has conducted tests of firearms and ammunition that are obtained in

evidence in criminal cases and has prepared hundreds of reports relating to the identification, origin and classification of firearms under the provisions of federal law. Special Agent Thurman also has access in his official capacity to the official records of all licensed firearms and ammunition manufacturers in the United States as well as all licensed firearms and ammunition importers in the United States.

Special Agent Thurman received specialized training from ATF in the origin, function and working requirements relative to the documentation of the history of various firearms and ammunition, including training at the Criminal Investigator School and National Academy Training - both at the Federal Law Enforcement Training Center - and the Firearms Trafficking Investigation School in Jacksonville, Florida, the Firearms Interstate Nexus Training in Washington, D.C., and the Advanced Firearm Interstate Nexus Training program held in Boston, Massachusetts.

Special Agent Thurman has attended numerous armorer schools, including Smith & Wesson, Harrington & Richardson, Marlin, Colt, Savage Arms and Stevens Arms. Among other duties that those assignments entail, he is responsible for examining firearms and ammunition to determine their place of manufacture.

Special Agent Thurman has been involved in the study of firearms and ammunition for over 13 years and he keeps an extensive personal library of resource materials relating to that subject area.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney

November 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney for defendant STEPHEN DAROSA, Eugene Patrick McCann, Esq., on November 14, 2005, via electronic filing (Manzi & McCann, Attorneys At Law, 59 Jackson Street, Lawrence, Massachusetts 01840).

/s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney